

# **EXHIBIT**

# **B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re: Terrorist Attacks on September 11, 2001

03-md-1570 (GBD)(SN)  
ECF Case

*This document relates to:*

*Burnett, et al. v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN)

**DECLARATION OF DEBORAH L. BARRETT**

I, DEBORAH L. BARRETT, hereby declare under penalty of perjury as follows:

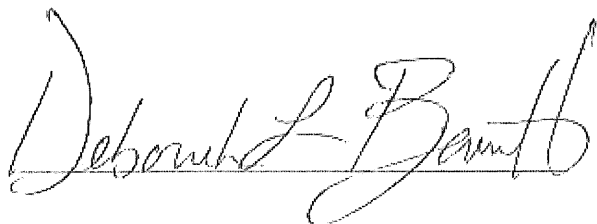
1. I am 57 years old and reside in Long Branch, New Jersey.
2. I was the fiancée of Brian T. Cummins who was killed in the September 11, 2001 terrorist attacks on the World Trade Center in New York where he was a partner with Cantor Fitzgerald.
3. At the time of his death on September 11, 2001, Brian and I had been engaged to each other for approximately ten months. He proposed to me on Christmas morning 2000. It was our intention to be married in the Tower Hill Catholic church located in Red Bank, New Jersey. To that end, we had begun counseling there with the parish priest who was also a long-time friend of Brian's family. Brian was Catholic and I was not and it was required that we undergo the counseling to receive the blessings of the church.
4. At the time of his death, Brian and I had been cohabitating for approximately three years, from sometime in 1999 until September 11, 2001.
5. During our time cohabitating together, Brian and I commingled our assets and shared all expenses and household responsibilities.

6. Prior to his death, Brian informed me that he had named me as his beneficiary on a life insurance policy provided by Cantor Fitzgerald. However, the records were destroyed in the terrorist attacks and have never been found.
7. Brian was eager to start a family together and shortly after we became engaged we began fertility counseling at the East Coast Infertility and IVF Clinic located in Little Silver, New Jersey. We attended an initial counseling session together, and we each went on separate occasions to provide samples to determine our suitability for the services offered by that clinic.
8. Brian and I travelled extensively over the course of our relationship. In fact, we had returned from a vacation together in Jackson Hole, Wyoming just two days before 9/11.
9. Brian and I had contracted to buy a house together on Portland Road in Highlands, New Jersey. The closing on that property was to take place two days after 9/11. Prior to that anticipated closing, Brian had sold his own home in Manasquan, New Jersey. Our plan was to sell my own home after we closed and moved into our new house in Highlands.
10. The relationship Brian and I had was based on our mutual respect, love and devotion to each other and we had big plans for having a family and growing old together.
11. The terrorist attacks on September 11, 2001, destroyed the life that Brian and I had been planning and building together, and my life will never be the same without him.

I declare under penalty of perjury that the foregoing is true and correct.

Date

8/27/2019

A handwritten signature in cursive script, appearing to read "Deborah L. Bant". The signature is written in dark ink and is positioned to the right of the date.